

November 8, 2004

Mr. Kenneth S. Putnam, Chairman
BWR Owners Group
Nuclear Management Company
Duane Arnold Energy Center
3277 DAEC Road
Palo, IA 52324

SUBJECT: INDUSTRY ACTIVITIES TO RESOLVE POTENTIAL ADVERSE FLOW EFFECTS
FROM POWER UPRATE OPERATION

Dear Mr. Putnam:

I am writing to request information about the Boiling Water Reactors Owners Group's (BWROG's) recent activities regarding potential adverse flow effects from power uprate operation.

During a public meeting with the Nuclear Regulatory Commission (NRC) staff on February 3, 2004, you stated that the BWROG had assumed the lead role for coordinating responses from the nuclear industry to concerns surrounding the potential for adverse flow effects on nuclear power plant structures, systems, and components (SSCs) during boiling water reactor (BWR) plant operation at power uprate conditions. During this meeting, you presented industry's short- and long-term plans and activities to resolve this issue. A schedule for the integrated industry plan was submitted by letter dated May 7, 2004. The letter summarized the results of BWR steam dryer inspections and an evaluation of the industry's development of a database for power uprate events.

During subsequent meetings with the NRC staff on August 18 and 31, 2004, the BWROG provided updates, as summarized below:

- Develop "best practices" steam dryer performance monitoring - September 2004
- Revise the General Electric guidelines for steam dryer inspections - September 2004
- Develop report on lessons-learned and recommendations in response to adverse flow effects from power uprate operation - December 2004
- Develop steam dryer inspection guidelines - December 2004
- Revise BWRVIP-06 with updated guidance for addressing loose parts in the reactor vessel, and steam and feedwater systems - December 2004
- Validate a methodology for determining steam dryer loading using main steam acoustic circuit analysis and verification with scale model testing and plant data - May 2005

Because of the NRC's significant interest in this issue, we would appreciate if the BWROG would provide to the NRC staff copies of the documents mentioned above as they become available. In addition, in order for us to remain fully informed of industry's efforts so that we can factor these efforts into our decisions on whether and what regulatory actions may be necessary, we would appreciate that the NRC staff be notified in advance of your plans to

conduct tests for validating the steam dryer loading methodology, or of any change in the scope of these tests, so that we can comment on and observe them as necessary. The NRC staff will review and provide any comments on the documents requested above, while trying to minimize its impact on your schedule for resolving this issue.

In addition, Exelon recently conducted an evaluation at Dresden and Quad Cities for SSCs that experienced performance problems at power uprate conditions. While they are taking corrective actions, Exelon is also conducting a detailed vulnerability assessment of the SSCs for potential performance problems during future power uprate operation. The staff has recommended that Exelon provide these lessons learned to the BWROG. Please consider this information as you develop industry-wide guidance for licensees currently operating or proposing to operate their plants at power uprate conditions.

Please contact Gene Imbro, Chief, NRR Mechanical and Civil Engineering Branch, at 301-415-3288 for any additional information regarding this request.

Sincerely,

/RA/

Brian W. Sheron
Associate Director for Project Licensing
and Technical Analysis
Office of Nuclear Reactor Regulation

Project No. 691

cc: See next page

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cc:

Mr. Joseph E. Conen
Vice Chairman, BWR Owners Group
DTE Energy – Fermi 2
200 TAC
6400 N. Dixie Highway
Newport, MI 48166

Mr. J. A. Gray, Jr.
Regulatory Response Group Chairman
BWR Owners Group
Entergy Nuclear Northeast
440 Hamilton Avenue Mail Stop 12C
White Plains, NY 10601-5029

Mr. H. Lewis Sumner
Executive Chairman, BWROG
Southern Nuclear Company
40 Inverness Center Parkway
P.O. Box 1295
Birmingham, AL 35242

Mr. William Holston
Manager, Engineering Services
Nine Mile Point - Station
OPS Building/2nd Floor
P.O. Box 63
Lycoming, NY 13093

Mr. Thomas G. Hurst
GE Nuclear Energy
M/C 782
3901 Castle Hayne Road
Wilmington, NC 28402

Mr. Thomas A. Green
GE Nuclear Energy
M/C 782
175 Curtner Avenue
San Jose, CA 95125

Mr. James Meister
Executive Vice Chairman, BWROG
Exelon
Cornerstone II at Cantera
4300 Winfield Road
Warrenville, IL 60555

Mr. William A. Eaton
ENTERGY
P.O. Box 31995
Jackson, MS 39286

Mr. Aloysius Wrape
General Manager, Perform
Mail Code GENPL4
Two North Ninth Street
Allentown, PA 18101

Mr. Richard Libra
DTE Energy
Fermi 2
M/C 280 OBA
6400 North Dixie Highway
Newport, MI 48166

Mr. James F. Klapproth
GE Nuclear Energy
M/C A-16
3901 Castle Hayne Road
Wilmington, NC 28402